## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

:

CAROLINA GUZMAN, on behalf of herself

and all others similarly situated

Civil Action No.: 1:20-cv-04545-ARR-

Plaintiff : JO

.

v. : **DEFENDANT'S NOTICE OF** 

**MOTION TO DISMISS** 

I.C. SYSTEM, INC.

:

Defendant.

**TO:** Adam J. Fishbein

735 Central Avenue

Woodmere, New York 11598 Email: fishbeinadamj@gmail.com

Attorneys for Plaintiff

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, the undersigned, attorneys for Defendant I.C. System, Inc. ("Defendant") will move before the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East Brooklyn, New York 11201 before Honorable Allyne R. Ross, United States District Judge, for an Order granting Defendant's Motion to Dismiss; and

**PLEASE TAKE FURTHER NOTICE** that Defendant shall rely upon the enclosed Brief in Support of the Motion and Certification of Peter G. Siachos and the exhibits attached thereto.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order is submitted with this motion.

Defendant respectfully requests oral argument if opposition is timely filed.

Dated: January 5, 2021

## GORDON REES SCULLY MANSUKHANI LLP

Attorneys for Defendant I.C. System, Inc.

By: <u>/s/ Peter G. Siachos</u> Peter G. Siachos, Esq.

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